

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
CYRANO, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	CIVIL ACTION NO. 05-CV-11558-DPW
QUOTIUM TECHNOLOGIES, INC.,)	
QUOTIUM TECHNOLOGIES, S.A., and)	
TECHNOLOGIES, S.A.,)	
)	
Defendants.)	
_____)	

**PLAINTIFF'S ASSENTED-TO MOTION TO ENLARGE TIME IN WHICH TO
RESPOND TO DEFENDANTS' MOTION TO DISMISS OR STAY**

Pursuant to Fed.R.Civ.P. 6(b), the Plaintiff, Cyrano, Inc. ("Cyrano"), hereby moves this Court for an extension of one week in which to file an opposition to the Defendants' Motion to Dismiss or Stay (the "motion"). The Defendants filed their motion on September 23, 2005. Accordingly, Cyrano's opposition is currently due to be filed on October 7, 2005. Cyrano seeks to enlarge the time for its filing one week to October 14, 2005.

As grounds for this request, Cyrano first states that Quotium's counsel has assented to this enlargement of time. Second, Quotium's motion, by assent, exceeds the twenty-page limit and contains a number of arguments that will require more extensive research and drafting. Finally, Cyrano is simultaneously drafting a memorandum in response to a motion that Quotium filed in a related action between the same parties that likewise requires extensive research of complex issues.

WHEREFORE, for all of the foregoing reasons, Cyrano requests that this Court enlarge the time in which it is to file its response to Quotium's motion to October 14, 2005.

Respectfully submitted,

Plaintiff,
CYRANO, INC.,
By its attorneys,

/s/ Michael K. Sugrue
Stephen Y. Chow, BBO #082990
Michael K. Sugrue, BBO #655878
PERKINS SMITH & COHEN LLP
One Beacon Street, 30th Floor
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(617) 854-4000

Dated: September 27, 2005

LOCAL RULE 7.1 CERTIFICATE OF COMPLIANCE

I, Michael K. Sugrue, hereby certify that on September 27, 2005, I conferred by telephone with Kevin J. O'Connor, counsel of record for the Defendants, in a good faith attempt to resolve or narrow the issues, and that Attorney O'Connor assented to the enlargement of time requested by this motion.

/s/ Michael K. Sugrue
Michael K. Sugrue

CERTIFICATE OF SERVICE

I, Michael K. Sugrue, hereby certify that a true copy of the foregoing Assented-To Motion To Enlarge Time In Which To Respond To Defendants' Motion To Dismiss Or Stay was served upon the following counsel by hand-delivery on this the 27th day of September, 2005:

Kevin J. O'Connor, Esq.
Mayeti Gametchu, Esq.
Paragon Law Group LLP
184 High Street
Boston, MA 02110

/s/ Michael K. Sugrue
Michael K. Sugrue